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6 Attorneys for Defendants
ALLEN CRUMPLER, d/b/a ACE
7 DEMOLITION and TRAVELERS PROPERTY
CASUALTY COMPANY OF AMERICA
8

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 JUAN M. SANCHEZ, an individual,
13 Plaintiff,

14 vs.

15 ALLEN CRUMPLER, d/b/a ACE
DEMOLITION; TRAVELERS PROPERTY
16 CASUALTY COMPANY OF AMERICA, a
Connecticut corporation; DOES I-X; and ROE
17 CORPORATIONS, I-X, inclusive,
18 Defendants.
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CASE NO. 2:18-cv-00023-MMD-PAL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO REMAND**

[First Request]

20 Pursuant to Local Rule 7-1, Plaintiff JUAN M. SANCHEZ ("Plaintiff") and Defendants
21 ALLEN CRUMPLER, d/b/a ACE DEMOLITION and TRAVELERS PROPERTY CASUALTY
22 COMPANY OF AMERICA ("Defendants"), by and through their respective counsel of record,
23 hereby file this stipulation to extend the time for Defendants to file their response to Plaintiff's
24 Motion to Remand (ECF No. 7). Plaintiff's Motion to Remand (ECF No. 7) was filed and served
25 electronically on January 9, 2018. Pursuant to Local Rule 7-2(b), the current deadline for
26 Defendants to file and serve points and authorities in response to Plaintiff's Motion to Remand is
27 14 days from the date of service, or January 23, 2018.
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1 A brief extension of 14 days to file a response, or up to and including **February 6, 2018**, is
2 necessary because Defendants are in the process of determining if separate counsel will be
3 necessary and the brief extension will allow sufficient time to evaluate possible conflict issues and
4 also for separate counsel to be retained and get up to speed if it is determined that having separate
5 counsel is appropriate. This is the Parties' first request for an extension and the Parties agree and
6 represent that the requested extension is sought in good faith and not for purposes of unnecessary
7 delay.

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9 Dated: January 17, 2018

Dated: January 17, 2018

10 LEWIS BRISBOIS BISGAARD & SMITH LLP

THE COTTLE FIRM

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12 
13 BRUCE C. YOUNG, ESQ.
SCOTT H. BARBAG, ESQ.

14 /s/ *Matthew Minucci*
15 ROBERT W. COTTLE, ESQ.
MATTHEW D. MINUCCI, ESQ.

16 Attorneys for Defendants
Allen Crumpler, d/b/a Ace Demolition
and Travelers Property Casualty Company
of America

Attorneys for Plaintiff
Juan M. Sanchez

17
18 **ORDER**

19 IT IS SO ORDERED.

20 
21 UNITED STATES DISTRICT JUDGE

22 DATED: January 17, 2018
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